

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
RICHMOND DIVISION**

ARTURO ESPARZA MACIAS, *et al.*,

Plaintiffs,

v.

MONTERREY CONCRETE, LLC, and
JOSE DE LA ROSA,

Defendants.

Case No. 3:19-cv-00830-REP

PLAINTIFF JAIME MARQUEZ ESPARZA'S MOTION FOR RECONSIDERATION

Pursuant to Federal Rule of Civil Procedure 54(b), Plaintiff Jaime Marquez Esparza respectfully requests that the Court reconsider its Memorandum Opinion (ECF No. 119) and Order (ECF No. 120) granting in part and denying in part Defendants' Motion for Sanctions Under Federal Rule 37(d)(3) (ECF No. 37), for the reasons set forth in the accompanying memorandum in support. A proposed order granting the requested relief is attached hereto.

December 18, 2020

Respectfully submitted,

/s/ Preston Smith

Preston Smith (VA Bar # 86908)

Ian S. Hoffman (VA Bar # 75002)

Daniel A. Cantor (admitted *pro hac vice*)

ARNOLD & PORTER KAYE SCHOLER LLP

601 Massachusetts Ave., N.W.

Washington, D.C. 20001-3743

Telephone: +1 202.942.5000

Facsimile: +1 202.942.5999

E-mail: preston.smith@arnoldporter.com

E-mail: ian.hoffman@arnoldporter.com

E-mail: daniel.cantor@arnoldporter.com

Rachel Colleen McFarland (VA Bar # 89391)
Jason Blair Yarashes (VA Bar # 90211)
Legal Aid Justice Center
1000 Preston Avenue, Suite A
Charlottesville, VA 22903
Telephone : 434-977-0553
Fax: 434-977-0558
Email: rmcfarland@justice4all.org
Email: jasony@justice4all.org

Nicholas Cooper Marritz (VA Bar # 89795)
Simon Sandoval-Moshenberg (VA Bar #
77110)
Legal Aid Justice Center
6066 Leesburg Pike, Suite 520
Falls Church, VA 22041
Telephone: 703-778-3450
Fax: 703-778-3454
Email: nicholas@justice4all.org
Email: simon@justice4all.org

Counsel for Plaintiffs

CERTIFICATE OF SERVICE

I hereby certify that on December 18, 2020, I electronically filed the foregoing document via ECF, which caused a copy of the foregoing to be served on all counsel of record.

Respectfully submitted,

/s/ Preston Smith

Preston Smith (VA Bar # 86908)
ARNOLD & PORTER KAYE SCHOLER LLP
601 Massachusetts Ave., N.W.
Washington, D.C. 20001-3743
Telephone: +1 202.942.5000
Facsimile: +1 202.942.5999
E-mail: preston.smith@arnoldporter.com